

December 2nd, 2020

VIA email

Standing Committee on Finance and Economic Affairs
99 Wellesley Street East
Room 1405, Whitney Block
Queen's Park
Toronto, ON
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Attn: Amarjot Sandhu, Chair: amarjot.sandhu@pc.ola.org
Julia Douglas, Clerk: comm-financeaffairs@ola.org

CC: Hon. Rod Phillips, Minister of Finance: rod.phillipsco@pc.ola.org
Hon. Doug Ford, Premier of Ontario: doug.fordco@pc.ola.org

Re: Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020

Introduction

I am sending this submission to relay grave concerns regarding the Ontario Government's decision to include in Bill 229, the "*Protect, Support and Recover from COVID-19*" (*Budget Measures*) Act, **two Schedules (6 and 8) which do not support the stated objectives regarding COVID19 ("to help protect, support and recover"), but if adopted would instead: 1) Undermine Ontario's capacity to recover from the COVID-19 pandemic; 2) Make us more vulnerable to such pandemics in future; and 3) Undermine Ontario's capacity to prevent and mitigate related environmental disasters, including in particular: catastrophic floods, contamination of drinking water and the devastating public health and environmental impacts of loss of species and biodiversity.**

To ensure the Budget Bill does not undermine the stated goals of the Budget, and does not in particular undermine Ontario's capacity to recover from the current pandemic and to avoid such catastrophic pandemics in future, I respectfully, strongly urge that Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) and Schedule 8 (proposed changes to the Crown Forest Sustainability Act, 1994) both be withdrawn in their entirety from Bill 229.

Context for the Discussion: Protecting Natural Environments and Species is Essential

The Budget Bill is being introduced while a global pandemic that has brought the global economy to its knees, and killed more than 3,500 Ontarians, more than 10,000 Canadians and almost 1.5 million people around the world, is still ongoing; *indeed, the Budget bill is intended to help protect Ontario, support Ontario, and help Ontario to recover from this global pandemic.* **Unfortunately, Schedules 6 and 8 of the Budget Bill – which would undermine Conservation Authorities' capacity, and the processes and legislation that now protect critical wetlands, forests and at-risk and endangered species – contradict the stated goals of the Budget, and would if adopted undermine Ontario's capacity to recover from the pandemic and to avoid such catastrophic pandemics in future.**

Importance of Protecting Critical Ecosystems and Species

Preserving critical natural ecosystems and species is essential to protect public health, prevent and mitigate against climate change and its impacts, and provide many other significant benefits for Ontarians. Unfortunately, in recent decades, both here in Ontario and across the world, critical ecosystems (such as woodland forests and wetlands) and wildlife species and populations (of all kinds) have faced catastrophic declines, while over the same period, diseases that spread from animals to humans (zoonotic diseases) have rapidly multiplied.

Risk of Zoonotic Viruses and Pandemics

Today, some 60% of existing infectious diseases and 75% of new and emerging infectious diseases are “zoonotic” in nature, meaning they originate in animals but can then transfer suddenly and unexpectedly to humans.¹ **The SARSCOV2 (Covid19) Virus** is a zoonotic virus that originated in a so-called “wet market” in Wuhan, China, when it jumped from an animal (bat or pangolin) to humans. It is at least the 5th such virus in recent years, following HIV, H1N1, SARS, MERS and Ebola, and the most globally catastrophic to date.

The scientists that study such viruses indicate that mankind’s destruction of critical, biodiverse ecosystems (such as woodland forests, rainforests and wetlands) and species has established the conditions for these zoonotic viruses to thrive and made humans more vulnerable to them.² If we do not take care to slow our advance, and to protect at-risk and endangered critical ecosystems and species, COVID19 will be the first, but not the last globally catastrophic pandemic. ***It would be devastating for another globally catastrophic pandemic – (potentially this time originating in Ontario because of careless or willfully negligent and/or destructive environmental policy) -- to emerge and destroy even more lives here and elsewhere; the Budget Bill as now presented, including Schedules 6 and 8, poses that very real, (unthinkable) risk.***

Importance of and Need to Protect Conservation and Wetlands by Removing Schedule 6

Wetlands are essential for: water filtration and absorption; flood prevention and mitigation; carbon storage; climate change mitigation and adaptation; as habitats for critical, at-risk and endangered species; **and to help prevent zoonotic viruses, such as the SARSCOV2 virus that caused the COVID19 pandemic.**

Unfortunately, less than 30% of Ontario’s original wetlands remain in southern Ontario, and just 10% of Ontario’s original wetlands remain in the Greater Toronto and Niagara Regions. ***Further loss and/or disruption of the function of Ontario’s wetlands – when 70%-80% of these critically important wetlands have already been lost -- will have a devastating impact on Ontario’s water supply, on the frequency and severity of catastrophic floods, on Ontario’s efforts to mitigate climate change, and on our efforts to successfully emerge from the COVID19 pandemic and to avoid such pandemics in future.***

¹ The Centres for Disease Control, World Health Organization and other key institutions and organizations are reporting the significant and growing risk of zoonotic viruses.

² See “Conservationist: Protecting Nature an Investment in Our Health”, Conservation International, April 21, 2020, which notes that the spread of malaria and dengue fever, to name just two examples, has skyrocketed in areas with high levels of forest destruction caused by agricultural expansion, mining and logging.

Despite these already significant risks, and the Budget's stated goal of helping to protect Ontario from the COVID19 pandemic and support Ontario as it seeks to recover from the pandemic, the Budget Bill includes a Schedule – Schedule 6 – that will undermine (and arguably eliminate completely) Conservation Authorities' capacity to seek to protect Ontario wetlands and other critical ecosystems.

By including this Schedule in the Budget Bill, the Government undermines the stated goals of the Budget, and increases the risks from, rather than helping to protect Ontarians from, the current COVID19 and future such pandemics.

Importance of and Need to Protect Conservation, Forests and At-Risk Species by Removing Schedule 8

Forests are essential, and increasingly important, for: carbon capture, to protect biodiversity and provide habitat for at-risk, endangered and other species; with waterways, to support recreation and physical activity; and to increase the non-timber value of the regions and communities in which they reside. The *Crown Forest Sustainability Act, 1994 (CFSA)* applies to approximately two-thirds of Ontario's land base, which is home to numerous species at-risk and their habitat.

As noted above, scientists investigating the zoonotic viruses responsible for the COVID19 and other pandemics have confirmed that deforestation has played a significant role in increasing the prevalence of and human risks from/to these zoonotic viruses. ***Despite that, and the stated goal of the Budget to help protect Ontario, support Ontario, and help Ontario to recover from the global COVID19 pandemic, the Budget Bill includes a Schedule – Schedule 8 – which would effectively eliminate Ontario's capacity to continue to properly protect and manage Ontario forests, and prevent and mitigate the continued loss of at-risk and endangered species.***

Shockingly, given the increasing rather than decreasing importance of the protection of forests and at-risk species in the context of both the climate crisis and global COVID19 pandemic, Schedule 8 proposes a new exemption within the CFSA which seeks to exempt all forestry operations from mandatory consideration of species at-risk protection and recovery mandated by the Endangered Species Act, 2007 (ESA).

As the Canadian Environmental Law Association noted in its submission to the Committee: "Read in conjunction with the province's commitment to double logging in public forests and permanently exempt forestry from environmental assessment, Schedule 8 unravels what few legal mechanisms remained that prioritize conservation and protect natural areas in response to the biodiversity crisis."

Conclusion and Recommendation

The global COVID19 pandemic has brought into stark relief two essential facts, that: 1) There is no economy without public health and a healthy environment; and 2) Mankind cannot continue to destroy critical ecosystems and species, without increasing the prevalence of and risks to zoonotic viruses and pandemics, thereby negatively, even catastrophically impacting public health and the economy.

I had the opportunity to participate as a concerned citizen recently in a conference call with thousands of other concerned Ontarians organized to review the implications of the government's decision to include Schedules 6 and 8 in the Budget Bill. I can tell you the overriding reaction of Ontarians on the line – whose sensitivity to and concern about these issues has been amplified by the pandemic itself -- was one of shock, disbelief and anger.

That the Province would choose to include two significant environmental schedules (Schedules 6 and 8) in the Budget Bill, and seek to avoid proper notification of and consultation with Ontarians in doing so -- ***and that these Schedules would undermine the stated goals of the Budget Bill itself*** -- almost defies belief.

The Budget Bill as now drafted, including Schedules 6 and 8, not only fails the test it has set for itself, but would actively undermine the stated goals of the Budget itself – undermining the capacities, review processes, and critical ecosystems and species that Ontario needs to successfully emerge from the current pandemic, avoid such catastrophic pandemics, and protect public health, the environment and economy into the future.

To ensure the Budget Bill does not undermine the stated goals of the Budget, and does not in particular undermine Ontario's capacity to recover from the current pandemic and to avoid such catastrophic pandemics in future, I respectfully, strongly urge that Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) and Schedule 8 (proposed changes to the Crown Forest Sustainability Act, 1994) both be withdrawn in their entirety from Bill 229.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Morris'.

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